

SURFACE TRANSPORTATION BOARD DECISION

Docket No. RR 999 (Amendment No. 5)

231848
ENTERED
Office of Proceedings

FEB 13 2012

Part of
Public Record

Additional Comments by Patricia Jennings

I am submitting these comments in addition to my previously submitted comments to Docket RRR 999, Amendment No. 5. AMSA has asked for an extension of the effective date to November 1, 2012 from the current effective date April 2nd and it is to this request for an extension that I want to comment.

As background, my name is Patricia Jennings and I am President of Moving Pros Network LLC. My company publishes interstate household goods tariffs and the military 400NG tariff. We also offer an arbitration program for interstate household goods carriers, administered by the National Arbitration and Mediation, Inc. in NY.

Prior to starting my own company I worked for the American Moving and Storage Association (AMSA) as Senior Vice President, Programs and Services. I was responsible for developing and maintaining the former interstate 400N tariff which was used by approximately 2,000 interstate carriers and I worked with the Household Goods Carriers' Bureau Committee in developing and maintaining the rates and charges contained in the tariff. The AMSA arbitration program was under my supervision.

As a current software vendor/provider of the interstate tariff the changes required to comply with the STB decision will require:

- Changing program software code

- Changing language in the software forms, ie the estimate/order for service and the bill of lading that print out from the tariff software

- Changing the rules section of the tariff to incorporate the changes

These changes have to be made for every tariff customer and the updates posted online for customers to download. Customers also have to be educated on the new requirements. This is obviously a massive effort for software vendors.

We'll be ready within the next two weeks to have our tariff clients in compliance by April 2nd. While we have no objection to pushing back the effective date to November 1st, we ask STB to render a decision as soon as possible, at the latest by February 28th. If an extension is granted it will require us and all software vendors to go back and make additional changes to code and forms, backing out and putting the changes on hold until November 1st. We will also need to alert our mover clients that the date has been pushed back. There will be considerable confusion with a push-back to the effective date so we ask for as much lead time as possible.

Thank you for allowing me to provide comments.

Patricia Jennings, President
Moving Pros Network LLC
1216 W Braddock Rd.
Alexandria VA 22302

571-236-8746
www.movingprosnetwork.com
info@movingprosnetwork.com

I have served all parties in this proceeding.